# Exhibit F

# *Henderson*

*v.*

# *General Revenue Corporation, et al.*

30(b)(6)

## Mark Verbrugge

July 19, 2019

*Henderson v. General Revenue Corporation, et al.*

SMITH REPORTING
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analyst at the USA Group?
A. 1995.
Q. All right. What's your educational background?
A. I have a BS in business administration from Indiana University at Kokomo.
Q. And when did you get that degree?
A. '87, 1987.
Q. Do you work at that building that I saw up the highway, Navient? It's a large building.
A. Right off of 116th and 69. If you saw that one, yes.
Q. All right. What did you do to prepare for today's deposition?
A. I met with the counsel and my internal-external counsel.
Q. Did you review any documents?
A. We reviewed documents associated with the case, yes.
Q. And have you been designated to answer all the questions in our 30(b)(6) deposition today?
A. Yes.
(Whereupon Exhibit A is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:
Q. I'll show you what's about to be marked by the court reporter as Exhibit A and ask you, have you seen that document before?
A. I have.
Q. Do you know when you first saw it?
A. Yesterday.
Q. That was the first time you'd seen it?
A. Yeah. I believe that's the first time I saw it, yes.
Q. All right. And was the first time that you started looking for documents to answer these questions yesterday?
MS. SIMONETTI: This witness wasn't involved in gathering documents. That was handled through in-house counsel.
A. Can you rephrase the question?
MR. FISHWICK: Could you play that question back.
THE COURT REPORTER: "And was the first time that you started looking for documents to answer these questions yesterday?"
MS. SIMONETTI: The witness wasn't involved in gathering documents for the case. It was sent to in-house counsel.

FURTHER QUESTIONS BY MR. FISHWICK:
Q. You can go ahead and answer the question.
A. I did not gather documents.
Q. Was the first time that you looked at documents yesterday?
A. Yes.
Q. So your -- was your entire preparation for today's deposition done yesterday?
A. Yes.
Q. I draw your attention to Question 1 of the 30(b)(6) notice. So we're just going to go through this in chronological order today. So we'll start at No. 1. What's your answer to the question?
MS. SIMONETTI: What's the question? That is completely improper, and it's actually absurd. So what's the question, John?
FURTHER QUESTIONS BY MR. FISHWICK:
Q. Go ahead. You can answer.
A. I don't know what the question is.
Q. Okay. Do you have any -- have you studied No. 1, and do you have a response to the administration, organizational, and management structure of NPM from June 22 to

A. To the best of my knowledge, I believe he's part of Navient Solutions, LLC.
Q. That's who he works for?
A. To the best of my knowledge, yes.
Q. That's his employer?
MS. SIMONETTI: This is irrelevant. Go ahead and answer the question again.
A. Yeah. To the best of my knowledge, that's who he works for.
MR. FISHWICK: I don't think you can be in here. You're not a party to this case.
MR. SHELDON: I represent them.
MS. SIMONETTI: Yeah, he can. He's in-house counsel representing NPM.
MR. FISHWICK: He says, though, you work for Navient Solutions.
MR. SHELDON: That's who I'm employed by, but I represent this entity.
MR. FISHWICK: You're their corporate counsel?
MR. SHELDON: Yes.
MS. SIMONETTI: Uh-huh.
MR. FISHWICK: How can you be their in-house corporate counsel if you don't work for them?

Portfolio Management.
Q. Are there any policies on which ones are forwarded to Navient Portfolio Management?
A. If there is an actionable item required to be taken on an account that requires involvement of NPM, that would be required to be forwarded to Navient Portfolio Management.
Q. And is there documentation of that requirement?
A. I don't think there's a specific policy that says, "actionable events." We have training manuals for all our vendors that discuss what needs to be sent and what doesn't need to be sent.
Q. And does NPM prepare those training manuals?
A. NPM does produce training manuals or training documentation, yes.
Q. And so would those training manuals have had -- they have in there that if it's an actionable item, that it should be forwarded to NPM?
A. Yes.
Q. And were there training manuals in place for Mr. Henderson's account?
A. Yes.

Q. And it would have been -- and there would have been -- those manuals would have given instruction to people about how to handle his account?

MS. SIMONETTI: That's ambiguous.

Go ahead.

A. That's not what I'm saying, no. There are training documents that inform agencies to forward requests. For example, if a borrower requests of General Revenue that they require a statement of account, that request would come to -- from General Revenue or any agency to Navient Portfolio Management to provide statement of account on behalf of the borrower.

Q. And so the General Revenue employee would know from the training manual that they were supposed to forward that document to NPM?

A. There's no other way to fulfill the request. GRC cannot produce the statement of accounts off their system.

Q. So, but just in answer to my question, the GRC employee would know from the training manual that they're supposed to forward it to NPM?

A. Yes.
Q. And did that happen in this case with Mr. Henderson's case?
A. Yes.
Q. So, but -- and so when the GRC employee forwarded it to NPM, they were doing that because of the training they'd received pursuant to this training manual?
A. I can't answer your question like that, no.
Q. All right. Why not?
A. I have no idea what the person that received the request for statement of account's intentions were. In order to fill Mr. Henderson's request for an SOA, the only way to fulfill the request would be to forward it to Navient Portfolio Management.
Q. But did that GRC employee -- how's the training take place? Do they -- is it a PowerPoint? Is it a document they have to read? How does that take place?
A. We have a documented training manual that outlines where to send those types of requests.
Q. And how does the -- for example, in this case, how does the GRC employee receive that

training?
A. We provide the agency the training manual. I don't know -- I can't speak to their training processes.
Q. So you give, in this case, GRC a training manual for them to teach their employees?
A. Specific to the touch points between their agency and Navient Portfolio Management, yes.
Q. And do you require documentation that the employees, in this case, of GRC have received the training?
A. No.
Q. How big is the manual?
A. That's hard to answer for this reason. We have many clients, all with different requirements. Specific to the FFELP student loans, Mr. Henderson, it's probably only about 10 pages long.
Q. All right. Are there any other training manuals that would be relevant to Mr. Henderson's case?
A. No.
MR. FISHWICK: Lisa, have you produced that training manual?
MS. SIMONETTI: No. I see no relevance

to it whatsoever.

(Whereupon Exhibit No. 2 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I'll show you what's been marked as Exhibit 2 and ask you to identify what that document is.

A. It appears to be a letter written by Mr. Henderson and submitted to General Revenue.

Q. Have you seen it before?

A. I can't say that I've seen this specific letter, no.

Q. Would NPM have received notice of this letter?

A. I don't know.

Q. Have you checked to see if NPM did receive notice of this letter?

A. I have not.

Q. Are there any policies, procedures, or training manuals of NPM that would cover this letter?

MS. SIMONETTI: That's vague.

Do you understand the question?

THE WITNESS: I do not.

A. Correct.

(Whereupon Exhibit No. 3 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I show you what's been marked as Exhibit 3. Have you seen this document before?

A. I did see this document.

Q. And did you see it yesterday?

A. That is correct.

Q. And what is this document?

A. Again, written correspondence from Mr. Henderson to General Revenue Corporation.

Q. And would NPM have received notice of this? Or did NPM receive notice of this?

A. I don't know.

Q. As part of your preparation for today's deposition, did you research as to whether NPM received notice of Exhibit 3?

A. I have not.

Q. Are there any policies, procedures, or training manuals that would affect whether NPM received notice of Exhibit 3?

A. Yes.

Q. And what are those?

A. The same as we've discussed.

Q. The training manual?
A. Correct.
Q. If this -- if Exhibit 3 had been forwarded to NPM, which team would have handled that?
A. This team it would have gone to, I call it our customer care center. We refer to inside as Post-Claims Assistance.
Q. Okay. I think we discussed that.
A. That's what I call -- like what I'll call my customer care team.
Q. And what is the customer care team?
A. Led by Jim Trout. It was discussed earlier when we went through the individual teams within Navient Portfolio Management. The customer care team receives borrower correspondence, fulfills requests for borrower correspondence. They're an inbound call center specific to for any borrower that has questions on their account, they can call Post-Claims Assistance to obtain answers on their outstanding questions.
Q. Did Mr. Henderson ever call in to the customer care?
A. Not that I'm aware of.
Q. Did you investigate whether he had?

A. I have not.
Q. Did you speak to anybody at the customer care team before to prepare for today's deposition?
A. No.
Q. If someone calls in to the -- if Mr. Henderson had called in to the customer care, would there be a recording of that?
A. Should be a record of the call, correct.
Q. Has anybody at NPM done a search to see if there are any calls?
A. Not that I'm aware of.
MS. SIMONETTI: In-house counsel looked for call recordings. There weren't any, John.
FURTHER QUESTIONS BY MR. FISHWICK:
Q. And how did in-house counsel search for Mr. Henderson's calls?
A. I can't speak to how they searched for their calls.
Q. Did he consult with you when he did it?
A. Did he --
Q. Did in-house counsel consult with you when he did the search?
A. If memory's correct, in-house counsel sent a

request for documentation on the account. I can't speak to if that was part of it.

Q. Do you know when that was sent?

A. No.

Q. And would this have been Mr. Sheldon?

A. I can't recall who sent the request.

Q. Are there other in-house counsel?

A. There -- there are other in-house counsel, yes.

Q. And do they work for Navient Solutions as well?

A. I can't speak to that. I don't know.

Q. Well, your counsel said that in-house counsel searched for any recordings from Mr. Henderson. What's your knowledge of that?

A. I didn't -- I didn't -- I can't answer that question.

Q. All right. So you didn't do any independent investigation to prepare for today to answer that question?

A. No.

Q. Okay.

(Whereupon Exhibit No. 4 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:
Q. The 30(b)(6) notice.
A. Repeat, please.
Q. Turn to the top of page 3. Have you done an investigation into phone calls made by GRC/Pioneer following the February 28, 2017, as part of their collection efforts of the alleged Henderson debt?
A. I have not.
Q. For No. 4 on the notice, have you done an investigation between communications between NPM, USAF, GRC, Navient, and Pioneer regarding Mr. Henderson's alleged debt?
A. No.
Q. Have you done any investigation under No. 4 concerning how the principal, interest, and fees were calculated?
A. No.
Q. Have you done any investigation into any calculation methods or explanation of calculations?
A. No.
Q. Turning to No. 5. Who was Zenith Bank?
A. I have no idea.
Q. Have you done any investigation in

preparation for today to determine that?
A. No.
Q. Have you done any investigation between the relationship between NPM and Zenith Bank?
A. No.
MS. SIMONETTI: Calls for speculation. Also lacks foundation.
FURTHER QUESTIONS BY MR. FISHWICK:
Q. Have you done any investigation into the relationship between NPM and Zenith Bank as relates to the servicing and/or collection of Henderson's alleged loan or debt?
MS. SIMONETTI: Lacks foundation.
A. No.
Q. Turning to No. 6. Where are the documents as relates to Mr. Henderson stored?
A. Clarify the question.
Q. Have you done any investigation as to where the documents as relates to Mr. Henderson's alleged student loan debt are stored?
A. No, I haven't done any investigation as to where the documents specific to Mr. Henderson's case are stored.
Q. Do you have any general knowledge about where they would be stored?

A. There is an imaging system that documents, upon receipt, are stored in.
Q. And what is that called?
A. ECS.
Q. And what is ECS? How does it work?
A. I have no idea how the imaging system works other than documents are scanned and stored within the ECS system.
Q. All right.
A. And categorized with account information so we can pull specific to borrowers.
Q. Are there -- is there a -- in the ECS system, is there a file for Mr. Henderson?
A. I have not investigated if there is a file for Mr. Henderson in ECS.
Q. And do you know how, if there is a file, like, would it be by account number that you can search it?
A. You can search by account number.
Q. Can you search by name?
A. I'm not aware in the ECS system if you can search by name.
Q. All right. And so who has access to the ECS system?
A. NPM employees.

A. Correct.
Q. Would there be any hard copy anywhere?
A. With -- within Navient Portfolio Management?
Q. Or from anybody.
A. I can't speak for anybody.
Q. Does -- how about within NPM?
A. It would be in the ECS system.
Q. Period?
A. Correct.
Q. Turning to No. 8, Question No. 8. Are you aware of any calculations performed by NPM as to alleged amounts of principal, interest, or fees owed by Henderson in which NPM, GRC, and Pioneer have attempted to collect?
A. I apologize, but I'm going to have you read that back.
Q. Are you aware of any calculations performed by NPM as to alleged amounts of principal, interest, or fees owed by Henderson in which NPM, GRC, and Pioneer have attempted to collect?
A. I am not.
Q. Did you do any investigation into that prior to today's deposition?
A. No.

Q. How long did you meet with counsel yesterday?
A. Two hours.
Q. And was that the extent of your entire preparation for today, that two-hour meeting?
A. Correct.
Q. And was your meeting with counsel with both Ms. Salmonetti and Mr. Sheldon?
MS. SIMONETTI: Simonetti.
FURTHER QUESTIONS BY MR. FISHWICK:
Q. Simonetti.
A. Yes.
(Whereupon Exhibit No. 7 is marked for identification.)
FURTHER QUESTIONS BY MR. FISHWICK:
Q. I'll show you what's been marked as Exhibit 7. I'll show you what's been marked as Exhibit 7 and ask you if you've seen that before.
A. Yeah. I saw it earlier today. I think it's this same letter.
Q. But other than in the deposition, you hadn't seen it before today?
A. I reviewed documents yesterday that I'm not sure if I saw the one dated February 28. I think I stated that earlier. So I don't

believe so. I don't recall seeing this specific letter.

Q. Now, would this be what you testified to earlier, that the training manual would cover the NPM response to this?

A. The NPM training document would inform the agency upon such a request to send it to Navient Portfolio Management to fulfill.

Q. And what does the training say about, like, how promptly that should happen?

A. I don't believe the training manual speaks to the promptness.

Q. Okay. Again, you don't know when NPM got this?

A. No.

Q. And does NPM actually get the letter? Does the policy provide that it gets the actual letter from the person who owes the money?

A. I don't know if the policy states that we need to obtain the actual letter.

Q. All right. Do you know if you got this actual letter in the NPM system?

A. I do not.

Q. Are there -- other than the training manual, are there any other policies or procedures of

FURTHER QUESTIONS BY MR. FISHWICK:
Q. I show you what's been marked as Exhibit 8.
Is this the one that you think you've seen before?
A. I know I saw it earlier today, again, so.
Q. And the same answer? The training manual would have covered it for the agency as to for them to notify NPM that they needed to -- that they needed to respond to this?
A. Correct.
Q. And the response was the -- we've seen earlier in the deposition, that's what was triggered as the response?
A. I -- can you --
Q. Let me just get the exhibit number.
And I show you what was previously marked as Exhibit 4. Would that have been the response?
A. Had NPM received a request to produce a statement of account, that would have been the response, correct. And I assume that that is the response based upon the production of said document.
Q. But you haven't gone to check to see if they did receive this request within the software?

A. Correct. I have not.
Q. Okay. Turn to No. 10. What is the process in place when a borrower or debtor asks for a verification?
MS. SIMONETTI: Can you read that back.
Is that question directed to NPM or --
MR. FISHWICK: Yes. It's No. 10.
MS. SIMONETTI: Are you asking about NPM's process?
Can you read that back.
THE COURT REPORTER: "What is the process in place when a borrower or debtor asks for a verification?"
MS. SIMONETTI: I think that's vague.
But go ahead.
A. A borrower requesting validation of debt will -- the SOA will be produced and sent.
Q. And that's -- and so that comes in through Eagle, and then the notation is made by an NPM employee when the -- when it issues its statement?
A. The question you ask is confusing. The agencies, when they receive a request for debt validation, they send a request for an SOA to Navient Portfolio Management. Navient

Portfolio Management fulfills the request of the SOA.

Q. And the data for that SOA comes from Eagle?

A. That is correct.

Q. It's generated by the Eagle software program?

A. It's generated -- yes.

(Whereupon Exhibit No. 9 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I show you what's been marked as Exhibit 9. Have you seen this document before?

A. I have.

Q. And what is that document?

A. It's an agreement for collection services of defaulted student loans owned by United Student Aid Funds between Navient Portfolio Management, LLC and Pioneer Credit Recovery, Inc.

Q. In the second paragraph on the first page of that agreement, it says that Navient, the first line there, "desires to utilize contractor debt collection services." What are those?

A. I don't know how other to say it other than, you know, we contract with collection

The document we talked about earlier, and it also talks about a Compliance/Portfolio Management Audit Guide, which is really one document in and of itself.
Q. So what is the Navient Portfolio Management Compliance Guide?
A. It's a document that ensures -- well, informs agencies -- informs agencies how -- it's really just a document to ensure agencies are maintaining compliance with state and federal regulations.
Q. All right.
MR. FISHWICK: And has that been produced in this case?
MS. SIMONETTI: I don't believe so. It's not a document that belongs to NPM, the company NPM, so I don't believe so.
FURTHER QUESTIONS BY MR. FISHWICK:
Q. Who does that document belong to? It's called the Navient Portfolio Management Compliance Guide.
A. The compliance guide is owned by a compliance arm of Navient Solutions, LLC.
Q. And who is that? Is it Navient Solutions that owns this or is it --

A. They are the ones that are responsible for producing the compliance guide, correct.
Q. And what do you mean, responsible for producing?
A. Drafting, updating, revising the compliance guide.
Q. Does Navient Portfolio Management Compliance Guide, does NPM have a copy of that?
A. Yes.
Q. You have it within your company's records?
A. Yes.
Q. And where is it?
A. On a shared drive.
Q. And is that within one of the software programs or just a shared drive for employees?
A. Just a shared drive for employees.
Q. All right. And so it's a -- it's something for your employees to follow?
A. It more so provides guidance, guidelines, guidelines to the agencies to follow.
Q. I see. So it tells your employees what to tell the agencies to do?
A. Repeat your question, please.
MR. FISHWICK: Go ahead.

Mr. Henderson?
A. Can you please -- can you either read it back or repeat your question?
THE COURT REPORTER: "Is there anything in this Navient Portfolio Management Compliance Guide that would have affected how the agencies interacted with Mr. Henderson?"
A. Yeah.
Q. What are those?
A. I can't -- I don't know the audit guide compliance guide by heart. Like I just told you, if the federal regs allow a borrower to be contacted five times a day, if the Navient compliance guide says we can only contact you three times a day, that would have affected the way the agency communicated with the borrower.
Q. But you didn't look at those documents in preparation for today's --
A. I did not.
Q. -- deposition? Okay. But it is one document?
A. It is one document.
Q. Turn to page 7, please.
A. All right.

don't understand the question.
Q. In preparation for today, did you do an investigation into the question that's outlined in No. 14?
A. I don't really see a question in No. 14.
Q. Okay. Does NPM contend that the collection efforts as relates to Mr. Henderson did not follow its usual practice?
THE WITNESS: Can you please -- can you repeat that one back?
THE COURT REPORTER: "Does NPM contend that the collection efforts as relates to Mr. Henderson did not follow its usual practice?"
A. I'm not contending -- NPM is not contending.
Q. NPM is not, you said? Is NPM saying it followed its usual practice with Mr. Henderson?
A. As far as I'm aware, NPM followed its normal practice, yes.
Q. Did you do an investigation of that --
A. No.
Q. -- in preparation for today's deposition?
A. No.
Q. How does -- turn to No. 15. How does -- when

refunds?

MS. SIMONETTI: Lacks foundation.

Go ahead and answer it if you can.

A. Navient Portfolio Management's role with regards to borrower's tax refunds is limited. The federal regulations dictate what taxes can be offset, and the government Department of Education sends a file to the guarantor, in this case Great Lakes, that says a borrower's account has been certified or decertified for federal or state offset.

When the guarantor informs us that an account has been certified, that feeds to our system. It triggers that the account has been certified for offset per the government, and if indeed the borrower files taxes and doesn't take the appropriate steps to become decertified, their taxes will be intercepted and sent to the guarantor and subsequently then sent to us to update the system, and us, we'll send it then to the agency to let them know that the taxes were offset.

Q. And so, in Mr. Henderson's case, did the guarantor notify NPM?

A. I didn't look into whether the account was

ever certified.
Q. So, in preparation for today, you did not look into whether Mr. Henderson's account was certified for an administrative set-off for taxes?
A. I did not.
Q. If that had been done, what part of the software programs are involved in that?
A. The guarantor would be notified first. They would send a feed, a status update. I don't know the exact status. But that status would then indicate on Eagle that the account has been certified. And if a payment came in, it would be marked as IRS as to an IRS payment.
Q. All right.
A. Which is directly from the government as well.
Q. All right. And so that documentation, if existed for Mr. Henderson, would be in Eagle?
A. Yes.
Q. But, again, you didn't look at that in preparation for today?
A. No, sir.
Q. Why was Mr. Henderson's account removed from GRC and placed with Pioneer?

A. I didn't investigate as to why the account was recalled and placed to Pioneer, so my response would be purely speculative.

Q. Okay. And if you had done that work before this deposition, where would you have gone?

A. On the Eagle system.

Q. Since June 22 of 2016, who were the subordinate servicers NPM has contracted with?

A. Like, I couldn't name them off the top of my head.

Q. So, again, in preparation for today, you did not do any investigation into Question No. 18 on the deposition notice?

A. No, I did not.

Q. Besides Eagle, what other shared software/information systems exist between NPM and its agencies?

A. Specific to the FFELP business, the federally funded student loans?

Q. Yeah.

A. Eagle is the only system that we use. I mean, we talked about storage of documentations earlier that's on an ECS, but that's not with third-party vendors. So the

and the board.
Q. And who's on the board?
A. I have no idea.
Q. Did you investigate that in preparation for today's deposition?
A. I did not.
Q. Besides Mr. Remondi as president, did you investigate who the officers were of -- other officers were of Navient Corp.?
A. No.
Q. And did you investigate who any of the board of directors were of November Corp.?
A. No.
Q. And did you do that investigation from -- for June of 2016 to the present?
A. I did no investigation.
Q. All right. What is the state of incorporation of NPM?
A. Can you repeat that, please.
Q. Yeah. What state is NPM incorporated in?
MS. SIMONETTI: It's an LLC. We talked about this earlier.
A. Yeah.
Q. All right. What state is it incorporated in or what state is it -- is it registered in?

MS. SIMONETTI: For what purpose? That's vague.

FURTHER QUESTIONS BY MR. FISHWICK:

Q. What state is it incorporated in?

A. Honestly, I don't know.

Q. Did you do any investigation into that in preparation for today?

A. I did not.

Q. What state is Navient Corporation incorporated in?

A. I didn't investigate that either.

Q. All right. How, then, is a -- how is an LLC a subsidiary of -- how is Navient, NPM, a subsidiary of Navient Corp.?

A. I would say it's an affiliate of Navient Corp.

Q. And what does that mean?

A. It's one of the companies underneath the Navient Corp. umbrella. There are -- Navient Solutions, LLC is the servicing arm underneath Navient Corp. Portfolio Management, LLC is an affiliate underneath the umbrella of Navient Corp., the holding company.

Q. What are other affiliates?

mean?

A. Yeah. When borrowers need assistance with their account, pre-default, delinquency, if they need a forbearance, a deferment, there's call centers available. There's help available. That's what those people do. They provide direction to these borrowers to keep them in repayment, answer their questions, and service their loans, like anybody that has a mortgage or a car loan it has questions on to try to prevent them from defaulting and keeping them in repayment.

Q. Take a look at Question 21 in the Notice of Deposition.

A. All right.

Q. In preparation for today, did you identify what accounts those were?

A. No.

Q. So you don't know what those accounts are?

A. I do not.

Q. So you can't answer the question for 21 because you don't even know which accounts those are?

A. That is correct.

MS. SIMONETTI: Lacks foundation, too.

MR. FISHWICK: Pardon?
MS. SIMONETTI: Lacks foundation.
FURTHER QUESTIONS BY MR. FISHWICK:
Q. And since you don't know what accounts these are, you cannot provide an answer today of who assigned or created these accounts?
MS. SIMONETTI: Lacks foundation.
Go ahead.
A. I cannot, no.
(Whereupon Exhibit No. 12 is marked for identification.)
FURTHER QUESTIONS BY MR. FISHWICK:
Q. I show you what's been marked as Exhibit 12, and I'll ask you if you've seen that before.
A. Again, I think this is the same document we may have reviewed earlier today. I may have seen it yesterday, but I don't know if I -- you know, that's where I'm at. I've seen a lot of documents today.
Q. Did other residents of Virginia receive this same document?
MS. SIMONETTI: You mean the same form of document?
MR. FISHWICK: Yes. I agree with that objection.

to it since this was sent to Mr. Henderson?
A. There's been changes to this letter since November 25 of '16, that is correct.
Q. All right. In preparation for today, have you identified the identities and numbers of individuals in Virginia who received Exhibit 14 from June 22, 2016, to the present?
A. There was a request that, I believe, came from Matt to identify that population. I engaged our IT department to, lack of a better, I guess, scan the Eagle system for letters that were sent to borrowers in the State of Virginia.
Q. And do you have the names of those people?
A. The names could be produced. I know there was a count produced, but I'm sure the names could be attached to those, yes.
Q. And do you have those names today? Have you brought those names with you today?
A. I have not brought those names with me today.
Q. Did you do any research on those names prior to today?
A. I did not.
Q. Have you reviewed any of the interrogatory answers in this case that identify the

three different numbers on there.
Q. All right. And then the entry below that, it says, "12/27/16 invoice." What does that mean?
A. "12/27/16 DZ-DE invoice." I don't know what that code means. I don't.
Q. All right. You didn't look at that ahead of time?
A. I did not look at that ahead of time, and, quite frankly, I look at very few transaction level detail histories.
Q. Okay. And you didn't look at that in preparation for today?
A. No, I did not.
(Whereupon Exhibit No. 19 is marked for identification.)
FURTHER QUESTIONS BY MR. FISHWICK:
Q. I show you what's been marked as Exhibit 19 and ask you to identify that.
A. These are what appear to be collection notes from General Revenue Corporation.
Q. And do you know how they came into NPM's possession?
A. They would have had to have been requested from NPM.

identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I show you what's been marked as Exhibit 21. What is that document?

A. They appear to be collection notes from one of our vendors, but it doesn't specify the vendor or collection agency.

Q. So you don't know who gave this to you?

A. No, I do not. I assume that it was either General Revenue or Pioneer, and being that we've already looked at the collection notes from General Revenue, I assume this is the collection notes from Pioneer Credit Recovery.

Q. But you didn't investigate ahead of time to confirm that before this deposition?

A. No. There's two agencies that we're talking about, so I assume it's Pioneer, but I did not confirm it, no.

(Whereupon Exhibit No. 22 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I show you what's been marked as Exhibit 22 and ask you to identify that.

A. It appears it's a Navient policy for

policies. It could be bonus plans and anything related to the policies with running the business.

Q. Is there an index of what all those policies are?

A. I'm sure there is.

(Whereupon Exhibit No. 23 is marked for identification.)

FURTHER QUESTIONS BY MR. FISHWICK:

Q. I show you what's been marked as Exhibit 23 and ask you to identify that.

A. It's another policy, and this policy specific is the standard operating procedure related to payment processing.

Q. And is that how you described earlier when money comes in? What is this in reference to?

A. In no way, shape, or form is this policy related to Navient Portfolio Management. This is more related to what Navient Solutions, LLC does in relation to servicing borrowers pre-default.

Q. Okay. And that's what that policy is?

A. That, to the best of my knowledge, that's what that policy would be for. It has

nothing to do with NPM.

Q. Okay. But did you look at that ahead of time?

A. No. No reason to.

MR. FISHWICK: That's all the questions I have.

THE WITNESS: All right.

(The proceedings are concluded at 2:43 p.m.)